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9	
10	UNITED STATES DISTRICT COURT
11	DISTRICT OF NEVADA
12	DISTRICT OF TIZTINGT
13	
14	UNITED STATES OF AMERICA,) Case No.: 2:13-cr-00039-JAD-VCF
15	Plaintiff,)
16	vs.
17	RAMON DESAGE,)
18	Defendant.)
19	AMENDED UNOPPOSED MOTION TO
20	TRAVEL AND PROPOSED ORDER
21	Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright,
22	Esquire and Richard B. Herman, Esquire, and hereby moves this Court for permission to amend Mr.
23	Desage's travel dates from Las Vegas, Nevada to New York City to August 25, 2015 and returning
24	on August 27, 2015. While in New York City, Mr. Desage will be meeting with attorneys and he
25	will be staying at the St. Regis Hotel, 2 East 55th Street, New York, New York. On August 11, 2015
26	and August 12, 2015 the Court approved Mr. Desage's initial travel motions; unfortunately, Mr.
27	Desage's meeting in New York was cancelled and we are trying to reschedule with the Court's
28	approval.
- 11	

1 On August 19, 2015, Richard B. Herman, Counsel for Mr. Desage, personally discussed Mr. 2 Desage's initial travel request with Pre-Trial Services Officer Zack Bowen, who advises he consents 3 to this travel request. Mr. Herman provided Officer Bowen with Mr. Desage's travel itinerary and 4 hotel information. Mr. Desage will continue with electronic monitoring and will abide by all other 5 bail conditions. Upon his return to Las Vegas on August 27, 2015, Mr. Desage will give a courtesy 6 call to Officer Bowen. 7 Counsel for Mr. Desage has discussed the initial request with Assistant United States 8 Attorney Gregory Damm, who has no opposition to it. 9 DATED this 19th day of August 2015. 10 Respectfully submitted: 11 12 BY/s/ Richard A. Wright 13 RICHARD A. WRIGHT, ESQUIRE 300 S. Fourth Street 14 Suite 701 Las Vegas, NV 89101 15 Telephone: (702) 382-4004 Attorney for Defendant, Ramon Desage 16 17 BY /s/ Richard B. Herman 18 RICHARD B. HERMAN, ESQUIRE New York Bar No. 1898758 19 445 Park Avenue 9th Floor New York, NY 10022 20 Telephone: (212) 759-6300 Attorney for Defendant, Ramon Desage 21 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

ORDER This matter having come before the Court on the amended unopposed motion of Defendant Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to New York City on August 25, 2015 and returning August 27, 2015 is **GRANTED**. Dated: August 19, 2015 HONORABILE JENNIFER A. DORSEY Respectfully submitted by: WRIGHT STANISH & WINCKLER By /s/ Richard A. Wright RICHARD A. WRIGHT RICHARD B. HERMAN, P.C. /s/ Richard B. Herman RICHARD B. HERMAN